

REMARKS

In response to the above-identified Office Action, Claims 1-3, 5, 22, 24 and 26 are amended, no claims are cancelled and Claims 28-43 are added. Accordingly, Claims 1-3, 5, 10-13, 15-22, 24 and 26-27 are pending and are rejected. Reconsideration and withdrawal of the rejections of record are requested in view of such amendments and the following discussion.

I. Claim Rejections Under 35 U.S.C. §103

The Patent Office rejects Claims 1-3, 5, 10-13, 15-22, 24 and 26-27 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,343,311 issued to Salesky et al. ("Salesky") in view of U.S. Patent No. 5,949,788 to Ohshima ("Ohshima") and U.S. Patent No. 6,647,432 issued to Ahmed et al. ("Ahmed"). Applicant respectfully traverses this rejection.

To establish a *prima facie* case of obviousness, the following criteria must be met: (1) there must be some suggestion or motivation to modify the reference or combine the reference teachings; (2) there must be a reasonable expectation of success; and (3) the prior art references must teach or suggest all the claim limitations. [MPEP §2142] Based on Applicants' arguments provided below, Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness in view of the references of record.

Regarding Claim 1, Claim 1 includes the following claim features, which are neither taught nor suggested by either Salesky, Ohshima, Ahmed or the references of record:

identifying, by a video controller, a first updated portion of first video image data that has changed since a previous transmission to a first display;
transmitting the first updated portion of the first video image data from the video controller to a video memory contained within the first display.

Salesky describes a presenter client computer 12 that identifies data that has been updated within an image and limits transmission of data to updates of the image. As described in col. 12, lines 17-67 of Salesky, Salesky teaches the detection of updated image data by comparison to a stored image. As illustrated in FIG. 1 of Salesky, presenter client computer 12 transmits the updated image data to conference server 14, which is responsible for transmitting data to the attendee client computers 18A-18C, which displays an updated image. (See col. 12, lines 17-67.) Hence, Salesky teaches the transmission of an updated portion of video image data from a conference server to a client computer. Hence, Salesky provides no teaching regarding transmitting of identified updated image data from a video controller to a display device, as required by Claim 1.

Furthermore, Claim 1, as amended, requires:

wherein the first updated portion and the second updated portion are transmitted over a shared communication channel coupled between the video controller, the first display device and the second display device. (Emphasis added.)

Applicant respectfully submits that Salesky fails to teach a communication channel between presenter client computer 12 and display devices of attendee client computers 18A-18C.

Moreover, the Examiner's citing of Ohshima to include partially written line determination means fails to rectify the deficiencies attributed to Salesky in regards to the transmission of the first updated portion and the second updated portion over a shared communication channel coupled between the first video controller, the first display and the second display. In addition, the Examiner's citing of Ahmed to incorporate a system bus fails to rectify the deficiencies attributed to Salesky in failing to teach or suggest the first updated portion and the second updated portion transmitted over a shared communication channel coupled between the video controller, the first display and the second display, as required by Claim 1.

Accordingly, Applicant respectfully submits that the Examiner has failed to establish a *prima facie* case of Claim 1 as obvious over Salesky in view of Ohshima and further in view of Ahmed since the combination of references fail to teach or suggest the required features of Claim 1. Therefore, Applicant respectfully submits that Claim 1, as amended, is patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner reconsider and withdraw the §103(a) rejection of Claim 1.

Regarding Claims 2-3, 5 and 10-13, Claims 2-3, 5 and 10-13 depend from Claim 1 and therefore include the patentable claim features of Claim 1, as described above. Accordingly, Claims 2-3, 5 and 10-13, based on their dependency from Claim 1, are also patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner reconsider and withdraw the §103(a) rejection of Claims 2-3, 5 and 10-13.

Regarding new Claims 32-33, Claims 32-33 depend from Claim 1 and therefore include the patentable claim features of Claim 1. Accordingly, Claims 32-33, based on their dependency from Claim 1, are also patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claims 32-33.

Regarding Claim 22, Claim 22 includes the following claim feature, which is neither taught nor suggested by either Salesky, Ohshima, Ahmed or the references of record:

a video controller coupled to the shared communication channel to transmit an identified, first updated portion of first video image data that has changed since a previous transmission to the first display device over the shared communication channel to the first display device, and to transmit an identified, second updated portion of second video image data that has changed since a previous transmission to the second display device over the shared communication channel to the second display device. (Emphasis added.)

By way of contrast, Salesky teaches the transmission of updated image data to a conference server 14, as illustrated in FIG. 1 of Salesky. In other words, as is clearly illustrated with

reference to FIG. 1 of Salesky, a communication channel does not exist between presenter client computer 12 and display devices attendee client computers 18A-18C, as required by Claim 22, as amended. Furthermore, as indicated above, the Examiner's citing of Ohshima and Ahmed fails to rectify the deficiencies of Salesky in failing to teach or suggest a shared communication channel coupled between a video controller and first and second display devices, as required by Claim 22.

Consequently, Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness of Claim 22, as amended, over Salesky in view of Ohshima and further in view of Ahmed since the combination of references fail to teach or suggest the required features of Claim 1. Accordingly, Claim 22, as amended, is patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner reconsider and withdraw the §103(a) rejection of Claim 22.

Regarding Claims 15-21, 24 and 26-27, Claims 15-21, 24 and 26-27 depend from Claim 22 and therefore include the patentable claim features of Claim 22, as described above. Accordingly, Claims 15-21, 24 and 26-27, based on their dependency from Claim 22, are also patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner reconsider and withdraw the §103(a) rejection of Claims 15-21, 24 and 26-27.

Regarding new Claims 28-31, Claims 28-31 depend from Claim 22 and therefore include the patentable claim features of Claim 22. Accordingly, Claims 28-31, based on their dependency from Claim 22, are also patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claims 28 and 29.

Regarding new Claim 34, new Claim 34 includes the following claim feature, which is neither taught nor suggested by either Salesky, Ohshima, Ahmed or the references of record:

updating a video memory of the display device if an address associated with the updated portion of the video image data matches a display device address.
(Emphasis added.)

Applicant respectfully submits that the references of record are devoid of any teachings or suggestions with regard to the updating of a video memory of a display device according to an address associated with the received updated portion of video image data. Accordingly, Applicant respectfully submits that new Claim 34 is patentable over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claim 34.

Regarding new Claims 35-38, new Claims 35-38 depend from new Claim 34 and therefore include the patentable claim features of Claim 34, as described above. Accordingly, new Claims 35-38, based on their dependency from Claim 34, are also over Salesky, Ohshima, Ahmed and the

references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claims 35-38.

Regarding new Claim 39, new Claim 39 requires a display device, including the following claim feature, which is neither taught nor suggested by either Salesky, Ohshima, Ahmed or the references of record:

a display interface to update the video memory of the display if an address associated with an updated portion of video image data received over a shared communication channel matches a display device address. (Emphasis added.)

For at least the reasons indicated above, Applicant respectfully submits that the references of record provide no teachings or suggestions regarding a display device that includes a display interface to update a video memory, as required by new Claim 39. Accordingly, new Claim 39 includes patentable claim features, which are neither taught nor suggested by either Salesky, Ohshima, Ahmed or the references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claim 39.

Regarding new Claims 40-43, new Claims 40-43 depend from Claim 39 and therefore include the patentable claim features of Claim 39, as described above. Accordingly, new Claims 40-43, based on their dependency from Claim 39, are also over Salesky, Ohshima, Ahmed and the references of record. Consequently, Applicant respectfully requests that the Examiner allow new Claims 40-43.

CONCLUSION

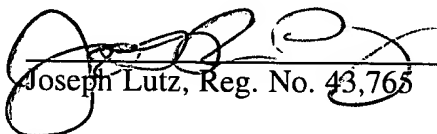
Applicant has amended the claims to recite features that are not taught or suggested by the references. No new matter is introduced by the Applicant's claim amendments, which are supported in Applicant's specification and are necessary for placing the present application in condition for allowance.

In view of the foregoing, it is believed that all claims now pending, namely Claims 1-4, 5, 10-13, 15-22, 24 and 26-443 patentably define the present application over the prior art of record, and are therefore in condition for allowance; and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800, ext. 738.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to:

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Marilyn Bass

April 14, 2004